

Response to EPA Comments on the Draft Project Management Plan (PMP)

Draft PMP Dated Dec. 20, 2016 - Rev. 0

Pre-Remedial Design and Remedial Design - Lower 8.3 Miles of the Lower Passaic River

Operable Unit Two (OU 2) of the Diamond Alkali Superfund Site

In and About Essex, Hudson, Bergen and Passaic Counties – New Jersey

Prepared February 2017

LProu2-17-2.1.3-0002

EPA COMMENTS (from 1/23/2017)			GSH RESPONSE	
PMP Section	Comment #	Comment	PMP Section	Comment
Acronyms/ Abbreviations	1	OU2: The term "Site" refers to the Diamond Alkali Superfund Site. To avoid confusion, OU2 should not be referred to as "Site", but rather as "lower 8.3 miles of the Lower Passaic River" or "lower 8.3 miles of the LPR" or "lower 8.3 miles" as appropriate. Delete "Site" from the end of this definition.	Acronyms/ Abbreviations	Deleted "site" from OU2 definition and added definition of "Project" and "Site".
	2	ROD: delete one of the two instances of "on March 3, 2016"	Throughout PMP	Revised reference to "Site" and "Project" as appropriate to be consistent with clarified definitions.
	3	USFW: Should be USFWS, U.S. Fish and Wildlife Service	Acronyms/ Abbreviations	Revised as per EPA comment.
	4	Please add "LBG: Louis Berger Group", "BAT: Battelle"		Revised as per EPA comment.
1.0 Authorization	5	Add a new Section 1.4 "Process for Updating the Project Management Plan" that explains the criteria that would trigger an update and the frequency of such updates. While the text box at the end of Section 1.2 does refer to "periodically" and "changes in project status and team members", further clarification would be helpful. "	1.0	Added reference to Section 1.4 in text box.
			1.4	Added Section 1.4 "Process for Updating the Project Management Plan" which includes clarification on review/update process.
			Revision Record Table	Added column in Revision Record to track "Full PMP Re Issue".
2.1 Project Setting	6	Last sentence: EPA does not number remedial actions, nor has it made any decisions on remedial actions for the LPRSA and Newark Bay. Please correct this sentence by deleting the end of the sentence: "...and represents the second of four planned remedial actions for the Site". If necessary, a discussion of the other operable units could be included as a separate paragraph.	2.1	Deleted "...and represents the second of four planned remedial actions for the Site."
2.2 Remedial Scope Summary	7	First sentence below bullets: Change the words "remedial action remedy" to "selected remedy"	2.2	Changed the words from "remedial action remedy" to "selected remedy".
2.3 Project Team / Stakeholders	8	EPA has updated the CIP and released a new draft dated January 2017 for public comment. Replace references to the 2006 CIP throughout the PMP text, as appropriate.	2.3 and throughout PMP	Updated entire PMP with reference to the January 2017 CIP (2017 Draft CIP).
2.3.1 Agencies	9	NJDEP: Re-phrase the 2 nd sentence to say "The NJDEP provided extensive technical and regulatory support during development of the ROD for OU2 sediments, and"	2.3.1	Revised as per EPA comment.
	10	Under "Other Federal Agencies": NJDOT/OMR is no longer a Partner Agency (and also is not a federal agency), so please remove that bullet point.		Deleted NJDOT-related bullet.

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2.3.3 Other Stakeholder Groups	11	Other potentially responsible parties (PRPs) named by EPA should be acknowledged in this section, possibly by adding them to the list of stakeholders in the first paragraph, first sentence: "Various other stakeholders (for example, people, interest groups, potentially responsible parties and other organizations or institutions...)...."	2.3.3	Added language on other PRPs and made reference to Appendix 9 (Regional Authorities) and Appendix 10 (Stakeholder Groups) of the 2017 Draft CIP.
2.4 Regulatory and Performance Considerations	12	Include a separate subsection on green remediation, since it is a priority.	2.4.5 Green Remediation	Added Section 2.4.5 as per EPA comments.
2.4.1 Permits and Authorizations	13	Re-write the paragraph to read: "Tetra Tech, on behalf of GSH, will comply with the substantive requirements of the permitting regulations that are considered applicable or relevant and appropriate requirements (ARAR) in the ROD and any other regulatory compliance elements that are required to accomplish the authorized scope of work. The Remedial Design Work Plan (RDWP) will include descriptions of the substantive requirements of the applicable permit regulations and other regulatory requirements. As the Project progresses, planning will be implemented to comply with the substantive requirements of the applicable permits and authorizations. Regulatory requirements that involve detailed information on how the remedial action will be performed will need to be deferred until the remedial action stage of the Project."	2.4.1	Re-wrote as per EPA comment.
2.4.1 Permits and Authorizations	14	This comment does not require edits to the PMP: NJDEP encourages early scoping and coordination with NJDEP to develop the information needed to comply with the substantive requirements of the permitting regulations that are considered ARARs.		Acknowledged.
2.4.2 Remedial Action Objectives	15	Add "and Remediation Goals" to the title of the section. Add a sentence referring to the interim remediation milestones and remediation goals described in Section 8 of the ROD that the remedy will need to achieve.	2.4.2	Revised section title as per EPA comment and re-wrote last paragraph to address comment on milestones and goals described in Section 8 of ROD.

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3.1.2 Remedial Action	16	Under "Institutional Controls": The prohibitions on fish and crab consumption are imposed by NJDEP, so EPA does not determine when they can be lifted or adjusted. Please re-word that bullet point to say: "These controls will be used to protect the engineered caps and maintain prohibitions on fish and crab consumption until NJDEP, in consultation with EPA, determines they can be lifted or adjusted based on data from long-term monitoring. Additional community outreach will be conducted to encourage greater awareness of the fish and crab consumption prohibitions."	3.1.2	Re-wrote as per EPA comment.
	17	Under "Long-term Monitoring and Maintenance": Add "remediation goals" after "interim milestones" (and "interim milestones" should be "interim remediation milestones" to correspond to ROD terminology).		Revisions made as per EPA comment.
3.2.4 Development, Submittal to Agencies and Agency Review	18	First bullet (Schedule): Please add a cross reference to Section 4.	3.2.4	Added reference to Section 4.
4.0 Schedule Management	19	In addition to Table 1, please provide a project schedule in MS Project format with a logic hierarchy. It is recognized that the submittal dates for some deliverables will be estimates that will need to be updated in the future.	4 & newly added Appendix C (Schedule Information)	Appendix C (Schedule information) was added and other appendices were re-sequenced (D through F) accordingly. Added project schedule, in MS Project format (as Appendix C-3). and added associated text in Section 4. Renamed Tables 1 and 2 as Appendix C-1 and C-2, respectively, and modified references throughout PMP.
5 Change Management	20	Add to last sentence: "NJDEP" after "EPA"	5	Revised as per EPA comment.
	21	Add at end: "Any remedy modifications will be made and documented in accordance with the CERCLA process and EPA's "A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents" (July 1999), through a memorandum to the Site file, an Explanation of Significant Differences or an Amendment to the ROD."		Revised as per EPA comment.
	22	Under "Field Investigation Activity Quality Control": Reference the UFP-QAPP, the FSP and RDWP as the "project specific plans"		Revised as per EPA comment.

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6.2 Quality Control Elements	23	Under "Design Quality Control", first paragraph, at end: Include the ROD in the list of "contract and regulatory requirements"	6.2	Revised as per EPA comment.
	24	Under "Nonconformance and Corrective Action": Suggest inclusion of root-cause analysis in Quality Event Reports. Please provide a copy of these reports to EPA.		Revised as per EPA comment - added language describing root-cause type analysis as part of QER (e.g. immediate causes and basic causes); and noted that EPA will be provided QERs.
--	--	--	7.1.3.3 Health & Safety Lead (H&S Lead)	Changed lead to Tami Froelich of Tetra Tech. <i>Revision not based on EPA comment.</i>
8.2 Meetings and Documentation	25	Indicate whether meeting minutes will be recorded (at least for key meetings) and who will be responsible for this documentation.	8.2	Added language to clarify planned meeting documentation.
9.2 Waste Management	26	The Site Selection and Evaluation process is described as generating a report documenting recommendations for off-site sediment processing facilities for sediment material generated during remedial action. In accordance with the AOC, the primary purpose of the Site Selection and Evaluation report should be to identify and select a site or sites for the sediment processing facility that will be used to dewater and otherwise process the dredged materials in preparation for off-site disposal in permitted treatment facilities and landfills in the United States or Canada. EPA expects that the Site Selection and Evaluation report will most likely identify a site or sites for the sediment processing facility that is close enough to the banks of the Lower Passaic River or Newark Bay to be on site, not off site. Therefore, in second bullet, delete "off-site".	9.2	In second bullet, deleted "off-site" (as per EPA comment) and reworded "Sediment material generated" to "Sediment dredged".
10 Procurement	27	Since this PMP focuses on the RD phase at this time, please provide more specifics about what this procurement applies to: whether it is primarily the predesign investigation and treatability studies or something else. EPA would encourage GSH and Tetra Tech to consider training and creation of local jobs or opportunities, and use of local small businesses, when appropriate, even in the RD phase.	10	Revised language to include information on possible subcontractors and GSH's commitment to providing opportunities for job training for local labor for select services and plan to evaluate further as the implementation of field activities approaches.
	28	In the box labeled "EPA Region 2 Contractors Management & Task Leaders", Add "USACE Kansas City District Contract Project Manager (Beth Franklin)" at the top, and identify Louis Berger personnel with "LBG" (similar to the identification of HDR or BAT personnel)		Revised as per EPA comment.

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Appendix B-2 (Org. Chart)	29	Replace the brown box labeled "USACE Kansas City District: Beth Franklin" with "Partner Agencies: NOAA (Reyhan Mehran), USFWS (Clay Stern), USACE New York District (Lisa Baron)"	Appendix B-2 (Org. Chart)	Revised as per EPA comment.
	30	Add a brown box labeled "CAG: Facilitator (Doug Sarno), Chairs (Debbie Mans & Ana Baptista)"		Revised as per EPA comment.
	--	--		Added GHD's role for data management contractor.
	--	--		Changed Tetra Tech H&S Lead to Tami Froelich (See Section 7.1.3.3).
Appendix D-1 (Communications Plan)	31	Make edits consistent with comments on Appendix B-2	Renamed Appendix E-1*	Made the Communication Plan (Appendix E-1) consistent with revisions to Appendix B-2, Organizational Chart (refer to Appendix B-2 comments and responses, above). *Note that with the addition of the Schedule Information (Appendix C), the Communications Management Appendix was changed from D to E.